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*Of Attorneys for Defendants Portland Police Bureau
and City of Portland*

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

CALE JOSEPHS, an individual,

Case No.

Plaintiff,

NOTICE OF REMOVAL

v.

PORTLAND POLICE BUREAU, a municipal
agency, CITY OF PORTLAND, a municipal
corporation, JOHN DOE #1, in his/her
individual and official capacity, JOHN DOE
#2, in his/her individual and official capacity,
and JOHN DOE #3, in his/her individual and
official capacity,

Defendants.

TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT
OF OREGON:

Removing parties, Portland Police Bureau and City of Portland, by their undersigned
attorney, respectfully show this Court:

1. The removing parties, Portland Police Bureau and City of Portland, are the
defendants in the above-entitled action.

2. On October 8, 2020, the above-entitled action was commenced against the
Portland Police Bureau and the City of Portland in the Circuit Court of the State of Oregon for
the County of Multnomah and is now pending in such court, with the court number 20CV34904.

3. On October 23, 2020, a copy of the Summonses and Complaint in the above-entitled state action was served upon the Portland City Attorney via email.

4. Each of the named defendants in this case agrees this action should be removed from state to federal court.

5. No further proceedings have been had in this action in state court.

6. This notice of removal is filed within 30 days after service of process.

7. This Court has original jurisdiction of the above-entitled action pursuant to 28 U.S.C. § 1331 because plaintiff alleges a violation of rights, privileges and immunities secured by the Constitution and laws of the United States. This action is removable under 28 U.S.C. § 1441(a).

8. Copies of the Complaint and Summons served on defendants Portland Police Bureau and City of Portland are attached to this Notice.

9. On the date set forth below, a copy of this notice was served on plaintiff's attorney. On the same date, a copy of this notice was filed with the clerk of the Multnomah County Circuit Court in which the action was commenced.

WHEREFORE, the Portland Police Bureau and City of Portland request that the above-entitled action be removed from the Circuit Court of the State of Oregon for the County of Multnomah to the United States District Court for the District of Oregon.

Dated: November 2, 2020.

/s/ Caroline Turco

Caroline Turco, OSB #083813

Deputy City Attorney

Telephone: (503) 823-4047

*Of Attorneys for Defendants Portland Police
Bureau and City of Portland*

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing NOTICE OF REMOVAL on:

Neal Weingart
1050 SW Sixth Ave. Suite 1415
Portland, OR 97204
Of Attorneys for Plaintiff

on November 2, 2020, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said attorney, to be sent by the following method(s):

- ☐ by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☐ by **facsimile transmission**.
- ☒ by **email**.

/s/ Caroline Turco

Caroline Turco, OSB #083813
Deputy City Attorney
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